

UNITED STATES DISTRICT COURT

NOV 01 2011 MLR

David J. Bradley, Clerk

SOUTHERN

DISTRICT OF

TEXAS Laredo Division

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

Juan Manuel Esquivel
Mt. Clemens, Michigan

Case Number: 5:11MJ1724

(Name and Address of Defendant)

I, the undersigned complainant state that the following is true and correct to the best of my

knowledge and belief. On or about October 30, 2011 in Webb County, in
 the Southern District of Texas Defendant(s) did,

(Track Statutory Language of Offense)

The defendant did knowingly and intentionally attempted to evade a reporting requirement, under Section 5316, by concealing more than ten thousand (\$10,000.00), namely \$295,903 in currency in the defendant's vehicle and attempted to transport such currency from a place within the United States, to wit; Laredo, Texas, to a place outside of the United States, to wit; the Republic of Mexico.

in violation of Title 31 United States Code, Section(s) 5332.

I further state that I am a(n) Special Agent and that this complaint is based on the
 following facts:

SEE ATTACHMENT A

Continued on the attached sheet and made a part of this complaint: X Yes No

Signature of Complainant

Marilyn Higgins
Printed Name of Complainant

Sworn to before me and signed in my presence,

November 1, 2011

Date

at Laredo, Texas

City and State

Guillermo R. Garcia, United States Magistrate Judge

Name and Title of Judicial Officer

Signature of Judicial Officer

Attachment A

I, Marilyn Higgins, a Special Agent of Homeland Security Investigations, have knowledge of the following facts:

1. On October 30, 2011, Customs and Border Protection (CBP) Officers stopped a blue Ford Explorer, displaying Michigan license plates [REDACTED] before it proceeded into Mexico via International Bridge Two in Laredo, Texas.
2. CBP Officers received a negative declaration from the driver of the vehicle, Juan Manuel ESQUIVEL, for weapons or currency or monetary instruments in excess of ten thousand dollars. ESQUIVEL stated that vehicle was his and he had purchased it 22 days prior.
3. Further inspection of the vehicle revealed \$295,903 in U.S. currency concealed within the vehicle's passenger side quarter panel. An additional, \$4,512 was seized from ESQUIVEL.
4. ESQUIVEL was read the Miranda warnings in the Spanish language by Special Agent (SA) Robert Flores witnessed by SA Marilyn Higgins. ESQUIVEL signed a Waiver of Rights form and agreed to answer questions concerning the incident.
5. ESQUIVEL stated that he purchased the vehicle 22 days prior for \$3200 and that he was traveling to Guanajuato, Mexico to visit his wife and child. ESQUIVEL then stated that he purchased the vehicle for a female he knows as DELFINA and registered it under his name. ESQUIVEL stated that he was to deliver the vehicle to the DELFINA'S uncle in Nuevo Laredo, Tamaulipas, Mexico.
6. ESQUIVEL stated that he was to be paid \$500 plus expenses to deliver the vehicle to Mexico.